



**Department of Energy**

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2987

MAY 22 2000

Mr. James A. Saric, Remedial Project Manager  
U.S. Environmental Protection Agency  
Region V-SRF-5J  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

DOE-0684-00

Mr. Tom Schneider, Project Manager  
Ohio Environmental Protection Agency  
401 East 5<sup>th</sup> Street  
Dayton, Ohio 45402-2911

Dear Mr. Saric and Mr. Schneider:

**TRANSMITTAL OF RESPONSES TO THE OHIO ENVIRONMENTAL PROTECTION AGENCY  
COMMENTS AND THE FINAL AREA 1, PHASE III CERTIFICATION DESIGN LETTER**

- References: 1) Letter, J. Saric to J. Reising, "Area 1, Phase III Certification Design Letter," dated March 21, 2000
- 2) Letter, T. Schneider to J. Reising, "Certification Design Letter for Area 1, Phase III," dated April 17, 2000

Enclosed for your review and approval are responses to the Ohio Environmental Protection Agency (OEPA) comments and the final Area 1, Phase III (A1PIII) Certification Design Letter (CDL). The CDL has been revised to incorporate responses to the OEPA's comments, and soil sampling has been initiated according to the approved A1PIII Certification Sampling Project Specific Plan.

If you have any questions or require additional information on these documents, please contact Robert Janke at (513) 648-3124.

Sincerely,

Johnny W. Reising  
Fernald Remedial Action  
Project Manager

FEMP:R.J. Janke

Enclosure

MAY 22 2000

Mr. James Saric  
Mr. Tom Schneider

-2-

cc w/enclosure:

G. Jablonowski, USEPA-V, SRF-8J  
T. Schneider, OEPA-Dayton (three copies of enclosure)  
F. Bell, ATSDR  
M. Schupe, HSI GeoTrans  
R. Vandegrift, ODH  
F. Hodge, Tetra Tech  
AR Coordinator, Fluor Fernald, Inc./78

cc w/o enclosure:

N. Hallein, EM-31/CLOV  
D. Carr, Fluor Fernald, Inc./2  
J. D. Chiou, Fluor Fernald, Inc./52-0  
K. Critchfield, Fluor Fernald, Inc./65-2  
T. Hagen, Fluor Fernald, Inc./65-2  
J. Harmon, Fluor Fernald, Inc./90  
S. Hinnefeld, Fluor Fernald, Inc./31  
M. Jewett, Fluor Fernald, Inc./52-2  
E. Kroger, Fluor Fernald, Inc./65-2  
T. Walsh, Fluor Fernald, Inc./65-2  
E. Woods, Fluor Fernald, Inc./65-2  
ECDC, Fluor Fernald, Inc./52-7

**RESPONSES TO OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS  
ON THE DRAFT CERTIFICATION DESIGN LETTER FOR AREA 1, PHASE III  
(20720-RP-0001, REVISION C)**

**FERNALD ENVIRONMENTAL MANAGEMENT PROJECT**

**GENERAL COMMENT**

Commenting Organization: Ohio EPA  
Section #: Pg. #: Line #: Commentator: OFFO  
Code: C  
Original Comment #: 1

Comment: As per prior agreements, all nonnative debris will need to be removed from this area. To completely characterize the unknown contents of the two fill areas, OEPA feels that further geophysical investigations, such as electromagnetic scans and ground penetrating radar, are necessary.

Response: DOE agrees to perform Ground Penetrating Radar (GPR) and electromagnetic (EM) scans in the two A1PIII fill areas and to remove as much non-native debris as practical. DOE will issue a map showing proposed cross-sections for the GPR and EM scans, and proposes a field meeting with the Agencies prior to implementation.

While non-native debris has been observed in the southwest fill area, the northeast fill area appears to consist of only soil and bedrock. DOE does not consider fill soil and bedrock to be non-native debris; therefore, DOE plans to leave these materials in place when confirmed by GPR and/or EM scans.

Action: Issue a map to the Agencies showing the proposed cross-sections for the GPR and EM scans. Conduct GPR and EM scans in the northeast and southwest fill areas and assess the path forward for removal of non-native debris.

**SPECIFIC COMMENTS**

Commenting Organization: Ohio EPA  
Section #: 1.0 Pg. #: 2 Line #: 1-7 Commentator: OFFO  
Code: C  
Original Comment #: 2

Comment: This paragraph is unclear in its description of A1PIII's boundaries. The text should reference a map and the map should include what part of A1PIII is now Area 6 and what southern sections were pulled into A1PIII. Please clarify.

Response: Agree that the text is unclear about the modifications to the southern A1PIII boundary, and that this information should be included on a map. The referenced text incorrectly mentions parts of Area 6 that were pulled into A1PIII. The previous boundary actually followed the gravel road that leads back to the Waste Pits Remedial Action Project, thus only excluding land from A1PIII. The excluded land will not be part of Area 6, as stated; instead, it will now be referred to as Area 1, Phase V (A1PV).

Action: The text will be revised accordingly and Figure 2 will be revised to show the former A1PIII boundary (from the SEP) and the new A1PV before issuing this CDL as final.

Commenting Organization: Ohio EPA

Commentator: OFFO

Section #: 2.1

Pg. #: 4

Line #: 17-19

Code: C

Original Comment #: 3

Comment: For clarification, the three borings that fall within A1PIII's disturbed areas should be marked clearly on Figure 3 and referenced here in the text.

Response: Agree that the text should have referenced the three borings (Zone 3-449, Zone 3-473, and 2052) as those that fell in the disturbed area along the southern A1PIII boundary. These borings are already shown on Figure 3.

Action: This change will be made to the text before issuing the CDL as final.